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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2008 Grand Jury

11	UNITED STATES OF AMERICA,)	CR No. 08-715 (A) - PSG
12	Plaintiff,)	F I R S T
13	v.)	S U P E R S E D I N G
14	STANLEY ALEXANDER HUDSON,)	I N D I C T M E N T
15	aka "Stanley Alexander,")	[18 U.S.C. § 1344: Bank Fraud;
16	aka "Brandon M. Courtney,")	18 U.S.C. § 1028A(a)(1):
17	aka "Isiah S. Ross,")	Aggravated Identity Theft; 18
18	aka "Kenneth Z.)	U.S.C. § 1029(a)(2):
19	Anderson," and)	Fraudulent Use of Unauthorized
20	THOMAS EDWIN COCHEE,)	Access Devices; 42 U.S.C.
21	aka "Kenneth Anderson,")	§ 408(a)(7)(B): Misuse of a
22	aka "Kevin Ross,")	Social Security Number;
23	aka "Jonathan Houston,")	18 U.S.C. §§ 2(a), 2(b): Aiding
24	aka "Nicholas Letterman,")	and Abetting and Causing an
25	aka "Rodney Hudson,")	Act to Be Done]
26	Defendants.)	
27)	
28)	

The Grand Jury charges:

COUNTS ONE through NINE

[18 U.S.C. §§ 1344; 2(a); 2(b)]

A. INTRODUCTION

At all times relevant to this First Superseding Indictment:

1 1. The deposits of Bank of America, N.A. ("Bank of
2 America"), Capital One Bank ("Capital One"), J.P. Morgan Chase
3 ("J.P. Morgan"), and Citibank, and the predecessor banks acquired
4 by those financial institutions that issued credit cards relevant
5 to this First Superseding Indictment, were insured by the Federal
6 Deposit Insurance Corporation (hereinafter, each of the
7 individual foregoing banks includes any predecessor bank acquired
8 by it that issued credit cards relevant to this First Superseding
9 Indictment; and all the foregoing banks, and the predecessor
10 banks acquired by them that issued credit cards relevant to this
11 First Superseding Indictment, collectively are referred to as the
12 "victim financial institutions").

13 B. THE FRAUDULENT SCHEME

14 2. Beginning in or about February 2003, and continuing
15 until in or about October 2008, in Los Angeles County, within the
16 Central District of California, and elsewhere, defendants STANLEY
17 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
18 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
19 Anderson," ("HUDSON"), and THOMAS EDWIN COCHEE, aka "Kenneth
20 Anderson," aka "Kevin Ross," aka "Jonathan Houston," aka
21 "Nicholas Letterman," and aka "Rodney Hudson" ("COCHEE"),
22 together with others unknown to the Grand Jury, each aiding and
23 abetting the other, knowingly executed, and willfully caused to
24 be executed, a scheme and artifice to defraud the victim
25 financial institutions as to material matters, and to obtain
26 monies, funds and assets owned by, and under the custody and
27 control of the victim financial institutions, by means of

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1 material false and fraudulent pretenses, representations, and
2 promises, and the concealment of material facts.

3 3. The fraudulent scheme operated in substance in the
4 following manner:

5 a. Between in or about February 2003 and in or about
6 October 2008, defendants HUDSON and COCHEE, together with others
7 unknown to the Grand Jury, each aiding and abetting the other,
8 applied for, and willfully caused others to apply for, over 50
9 credit cards issued by the victim financial institutions.

10 b. Defendant HUDSON, together with others unknown to
11 the Grand Jury, used on each credit card application, and
12 willfully caused others to use on each credit card application, a
13 social security number assigned by the Commissioner of Social
14 Security together with the name of an individual to whom the
15 application claimed the social security number had been issued,
16 knowing that the social security number was not assigned to
17 defendant HUDSON or the other person, and that the name was not
18 the true name of defendant HUDSON or the person to whom the
19 social security number had been assigned by the Commissioner of
20 Social Security.

21 c. Defendants HUDSON and COCHEE, together with others
22 unknown to the Grand Jury, each aiding and abetting the other,
23 applied to open, and used, and willfully caused others to apply
24 to open, and use, mailboxes at commercial mailings receiving
25 agencies ("CMRAs"), by using false names and fraudulent
26 identification cards.

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1 d. Defendant HUDSON, together with others unknown to
2 the Grand Jury, provided, and willfully caused to be provided, to
3 the victim financial institutions, the addresses of these CMRAs
4 on credit card applications.

5 e. Defendant HUDSON, together with others unknown to
6 the Grand Jury, added, and willfully caused to be added, himself
7 and defendant COCHEE as authorized users on several of the
8 fraudulent credit card accounts.

9 f. Defendants HUDSON and COCHEE, together with others
10 unknown to the Grand Jury, each aiding and abetting the other,
11 obtained, and willfully caused to be obtained, cash advances, and
12 made, and willfully caused to made, purchases, with their
13 fraudulently-obtained credit cards, thereby causing the victim
14 financial institutions to suffer approximately \$740,000 in
15 losses.

16 C. THE EXECUTION OF THE FRAUDULENT SCHEME

17 4. On or about the following dates, within the Central
18 District of California, and elsewhere, defendants HUDSON and
19 COCHEE, together with others unknown to the Grand Jury, each
20 aiding and abetting the other, committed, and willfully caused
21 others to commit, the following acts, each of which constituted
22 an execution of the fraudulent scheme:

<u>COUNT</u>	<u>DATE</u>	<u>ACT</u>
ONE	May 4, 2004	Submission of application in the name of Kenneth J. Courtney for credit card account number XXXX-XXXX-XXXX-5328, issued by J.P. Morgan.

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1 TWO February 1, 2005 Submission of application in the
2 name of Matthew T. Ross for
3 credit card account number XXXX-
XXXX-XXXX-7744, issued by Capital
One Bank.

4 THREE June 28, 2005 Submission of application in the
5 name of Brandon M. Courtney for
6 credit card account number XXXX-
XXXX-XXXX-0810, issued by Bank of
America.

7 FOUR January 31, 2006 Submission of application in the
8 name of Isiah S. Ross for credit
9 card account number XXXX-XXXX-
XXXX-9291, issued by J.P. Morgan.

10 FIVE June 27, 2006 Submission of application in the
11 name of Kenneth Z. Anderson for
12 credit card account number XXXX-
XXXX-XXXX-8709, issued by J.P.
Morgan.

13 SIX September 18, 2006 Submission of application in the
14 name of Brandon M. Courtney for
15 credit card account number XXXX-
XXXX-XXXX-1013, issued by J.P.
Morgan.

16 SEVEN September 20, 2006 Submission of application in the
17 name of Brandon M. Courtney for
18 credit card account number XXXX-
XXXX-XXXX-5280, issued by J.P.
Morgan.

19 EIGHT August 17, 2007 Submission of application in the
20 name of Brandon M. Courtney for
21 credit card account number XXXX-
XXXX-XXXX-8455, issued by J.P.
Morgan.

22 NINE February 5, 2008 Purchase of gift cards worth \$600
23 by using credit card account
24 number XXXX-XXXX-XXXX-1013,
25 issued by J.P. Morgan.

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1 COUNT TEN

2 [18 U.S.C. §§ 1028A(a)(1); 2(b)]

3 Beginning on a date unknown to the Grand Jury, and
4 continuing to on or about October 29, 2008, in Los Angeles
5 County, within the Central District of California, and elsewhere,
6 defendant STANLEY ALEXANDER HUDSON, also known as ("aka")
7 "Stanley Alexander," aka "Brandon M. Courtney," aka "Isiah S.
8 Ross," and aka "Kenneth Z. Anderson," knowingly transferred,
9 possessed, and used, without lawful authority, and willfully
10 caused to be transferred, possessed, and used, without lawful
11 authority, a means of identification of another person, namely,
12 the social security numbers of victims R.R., T.T., G.W., and
13 S.H., during and in relation to the crime of bank fraud, a felony
14 violation of Title 18, United States Code, Section 1344, as
15 charged in Counts Two through Nine of this First Superseding
16 Indictment.

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1 COUNT ELEVEN

2 [18 U.S.C. §§ 1029(a)(2); 2(a); 2(b)]

3 Beginning in or about February 2005, and continuing to in or
4 about January 2006, in Los Angeles County, within the Central
5 District of California, and elsewhere, defendants STANLEY
6 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
7 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
8 Anderson," and THOMAS EDWIN COCHEE, aka "Kenneth Anderson," aka
9 "Kevin Ross," aka "Jonathan Houston," aka "Nicholas Letterman,"
10 and aka "Rodney Hudson," each aiding and abetting the other, in
11 transactions affecting interstate and foreign commerce, knowingly
12 and with intent to defraud, trafficked in and used, and willfully
13 caused the trafficking in and use of, at least one unauthorized
14 access device, namely, credit card account number XXXX-XXXX-XXXX-
15 8821, and by such conduct obtained something of value aggregating
16 at least \$1,000 during that period.

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1 COUNT TWELVE

2 [18 U.S.C. §§ 1029(a)(2); 2(a); 2(b)]

3 Beginning in or about February 2006, and continuing to in or
4 about January 2007, in Los Angeles County, within the Central
5 District of California, and elsewhere, defendants STANLEY
6 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
7 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
8 Anderson," and THOMAS EDWIN COCHEE, aka "Kenneth Anderson," aka
9 "Kevin Ross," aka "Jonathan Houston," aka "Nicholas Letterman,"
10 and aka "Rodney Hudson," each aiding and abetting the other, in
11 transactions affecting interstate and foreign commerce, knowingly
12 and with intent to defraud, trafficked in and used, and willfully
13 caused the trafficking in and use of, at least one unauthorized
14 access device, namely, credit card account number XXXX-XXXX-XXXX-
15 9291, and by such conduct obtained something of value aggregating
16 at least \$1,000 during that period.

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1 COUNT THIRTEEN

2 [18 U.S.C. §§ 1028A(a)(1); 2(b)]

3 In or about January 2006, in Los Angeles County, within the
4 Central District of California, and elsewhere, defendant STANLEY
5 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
6 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
7 Anderson," knowingly transferred, possessed, and used, without
8 lawful authority, and willfully caused to be transferred,
9 possessed, and used, without lawful authority, a means of
10 identification of another person, namely, the social security
11 number of victim G.W., during and in relation to the crime of
12 fraudulent use of unauthorized access devices, a felony violation
13 of Title 18, United States Code, Section 1029(a)(2), as charged
14 in Count Twelve of this First Superseding Indictment.

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1 COUNT FOURTEEN

2 [18 U.S.C. §§ 1029(a)(2); 2(a); 2(b)]

3 Beginning in or about September 2007, and continuing to on
4 or about March 2008, in Los Angeles County, within the Central
5 District of California, and elsewhere, defendants STANLEY
6 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
7 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
8 Anderson," and THOMAS EDWIN COCHEE, aka "Kenneth Anderson," aka
9 "Kevin Ross," aka "Jonathan Houston," aka "Nicholas Letterman,"
10 and aka "Rodney Hudson," each aiding and abetting the other, in
11 transactions affecting interstate and foreign commerce, knowingly
12 and with intent to defraud, trafficked in and used, and willfully
13 caused the trafficking in and use of, at least one unauthorized
14 access device, namely, credit card account number XXXX-XXXX-XXXX-
15 8455, and by such conduct obtained something of value aggregating
16 at least \$1,000 during that period.

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1 COUNT FIFTEEN

2 [18 U.S.C. §§ 1028A(a)(1); 2(b)]

3 In or about August 2007, in Los Angeles County, within the
4 Central District of California, and elsewhere, defendant STANLEY
5 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
6 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
7 Anderson," knowingly transferred, possessed, and used, without
8 lawful authority, and willfully caused to be transferred,
9 possessed, and used, without lawful authority, a means of
10 identification of another person, namely, the social security
11 numbers of victim T.T., during and in relation to the crime of
12 fraudulent use of unauthorized access devices, a felony violation
13 of Title 18, United States Code, Section 1029(a)(2), as charged
14 in Count Fourteen of this First Superseding Indictment.

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1 COUNTS SIXTEEN through EIGHTEEN

2 [42 U.S.C. § 408(a)(7)(B); 18 U.S.C. § 2(b)]

3 On or about the following dates, in Los Angeles County,
4 within the Central District of California, defendant STANLEY
5 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
6 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
7 Anderson," ("HUDSON"), for an unlawful purpose and with intent to
8 deceive, falsely represented, and willfully caused to be falsely
9 represented, the following social security numbers to be the
10 social security numbers assigned by the Commissioner of Social
11 Security to defendant HUDSON and others, when, in fact, as
12 defendant HUDSON then well knew, such numbers were not the social
13 security numbers assigned by the Commissioner of Social Security
14 to defendant HUDSON and others:

<u>COUNT</u>	<u>DATE</u>	<u>NUMBER</u>
SIXTEEN	June 12, 2007	Social security number XXX-XX-0012 represented to Wells Fargo Bank, N.A.
SEVENTEEN	September 18, 2008	Social security number XXX-XX-8999 represented to Wells Fargo Bank, N.A.
EIGHTEEN	October 3, 2008	Social security number XXX-XX-1399 represented to Wells Fargo Bank, N.A.

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1 COUNT NINETEEN

2 [18 U.S.C. §§ 1028A(a)(1); 2(b)]

3 On or about June 12, 2007, in Los Angeles County, within the
4 Central District of California, and elsewhere, defendant STANLEY
5 ALEXANDER HUDSON, also known as ("aka") "Stanley Alexander," aka
6 "Brandon M. Courtney," aka "Isiah S. Ross," and aka "Kenneth Z.
7 Anderson," knowingly transferred, possessed, and used, without
8 lawful authority, and willfully caused to be transferred,
9 possessed, and used, without lawful authority, a means of
10 identification of another person, namely, the social security
11 number of victim T.T., during and in relation to the crime of
12 misuse of a social security number, a felony violation of Title
13 42, United States Code, Section 408(a)(7)(B), as charged in Count
14 Sixteen of this First Superseding Indictment.

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1 COUNT TWENTY

2 [18 U.S.C. §§ 1028A(a)(1); 2(b)]

3 On or about September 18, 2008, in Los Angeles County,
4 within the Central District of California, and elsewhere,
5 defendant STANLEY ALEXANDER HUDSON, also known as ("aka")
6 "Stanley Alexander," aka "Brandon M. Courtney," aka "Isiah S.
7 Ross," and aka "Kenneth Z. Anderson," knowingly transferred,
8 possessed, and used, without lawful authority, and willfully
9 caused to be transferred, possessed, and used, without lawful
10 authority, a means of identification of another person, namely,
11 the social security number of victim E.G., during and in relation
12 to the crime of misuse of a social security number, a felony
13 violation of Title 42, United States Code, Section 408(a)(7)(B),
14 as charged in Count Seventeen of this First Superseding
15 Indictment.

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1 COUNT TWENTY ONE

2 [18 U.S.C. §§ 1028A(a)(1); 2(b)]

3 On or about October 3, 2008, in Los Angeles County, within
4 the Central District of California, and elsewhere, defendant
5 STANLEY ALEXANDER HUDSON, also known as ("aka") "Stanley
6 Alexander," aka "Brandon M. Courtney," aka "Isiah S. Ross," and
7 aka "Kenneth Z. Anderson," knowingly transferred, possessed, and
8 used, without lawful authority, and willfully caused to be
9 transferred, possessed, and used, without lawful authority, a
10 means of identification of another person, namely, the social
11 security number of victim C.Y., during and in relation to the
12 crime of misuse of a social security number,

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1 a felony violation of Title 42, United States Code, Section
2 408(a)(7)(B), as charged in Count Eighteen of this First
3 Superseding Indictment.

4 A TRUE BILL
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6 *ISI*
7 Foreperson

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9 THOMAS P. O'BRIEN
United States Attorney

10 *Christine C Ewell*

12 CHRISTINE C. EWELL
Assistant United States Attorney
13 Chief, Criminal Division

14 RODRIGO A. CASTRO-SILVA
Assistant United States Attorney
15 Chief, General Crimes Section

16 PATRICIA DONAHUE
Assistant United States Attorney
17 Deputy Chief, General Crimes Section

18 HARVINDER S. ANAND
Assistant United States Attorney
19 General Crimes Section

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